

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADRIAN SCHOOLCRAFT,

Plaintiff, 10-CV-6005 (RWS)

-against-

THE CITY OF NEW YORK, et al.

NOTICE OF MOTION

Defendants

-----X

PLEASE TAKE NOTICE that, upon the annexed Declaration of Senior Counsel Alan Scheiner, Esq., dated September 21, 2015, and the exhibits annexed thereto; the accompanying Memorandum of Law; and upon all prior pleadings and proceedings had herein, Defendants City of New York, Deputy Chief Michael Marino, Gerald Nelson, Theodore Lauterborn, William Gough, Frederick Sawyer, Kurt Duncan, Christopher Broschart, Shantel James, and FDNY Lieutenant Elise Hanlon (collectively the “City defendants”) will move this Court, before the Honorable Robert W. Sweet, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard after October 9, 2015, for an Order precluding plaintiff from introducing certain evidence at trial, as specified in the accompanying Memorandum of Law dated September 21, 2015, and for such other and further relief as the Court may deem just and proper;

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, must be served on the undersigned on or before October 9, 2015, pursuant to the Court's prior order.

Dated: New York, New York
September 21, 2015

Respectfully submitted,

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorneys for City defendants
100 Church Street, Room 3-174
New York, New York 10007
(212) 356-2344
ascheiner@law.nyc.gov

By: /s/

Alan Scheiner
Senior Counsel
Cheryl Shammas
Senior Counsel
Kavin Thadani
Senior Counsel

cc: Nathaniel Smith (By ECF)
Attorney for Plaintiff

Jon Norinsberg (By ECF)
Attorney for Plaintiff

Gerald Cohen (By ECF)
Cohen & Fitch LLP
Attorneys for Plaintiff

Gregory John Radomisli (By ECF)
MARTIN CLEARWATER & BELL LLP
Attorneys for Jamaica Hospital Medical Center

Brian Lee (By ECF)
IVONE, DEVINE & JENSEN, LLP

Attorneys for Dr. Isak Isakov

Paul Callan (By ECF)
CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Lillian Aldana-Bernier

Walter Kretz (By ECF)
SCOPPETTA SEIFF KRETZ & ABERCROMBIE
Attorney for Defendant Mauriello

Docket No 10-CV-6005 (RWS)
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
ADRIAN SCHOOLCRAFT, Plaintiff, -against- THE CITY OF NEW YORK, et al., Defendants.
NOTICE OF MOTION OF CITY DEFENDANTS' MOTION IN LIMINE
ZACHARY W. CARTER <i>Corporation Counsel of the City of New York</i> <i>Attorney for City Defendants</i> <i>100 Church Street, Room 3-174</i> <i>New York, New York 10007</i> <i>Of Counsel: Alan H. Scheiner</i> <i>Tel: (212) 356-2344</i> <i>James Horton</i> <i>Tel: (212) 356-2647</i>
<i>Due and timely service is hereby admitted.</i> <i>New York, N.Y....., 2014</i> <i>..... Esq.</i> <i>Attorney for.....</i>